



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ALC/DCP/PTH
F. #2016R00505

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 15, 2019

By ECF and Email

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Re: United States v. Mark Nordlicht, et al.
Criminal Docket No. 16-640 (BMC)

Dear Counsel:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. All of the enclosed materials qualify as "Discovery Materials" under the January 23, 2017 Stipulation and Order entered in the above-captioned case, ECF Docket No. 76, and their use and dissemination are restricted as provided in that Stipulation and Order. This disclosure supplements the government's earlier disclosures by letters dated January 23, 2017, January 26, 2017, February 14, 2017, February 24, 2017, March 9, 2017, March 27, 2017, April 3, 2017, April 12, 2017, April 26, 2017, May 5, 2017, May 11, 2017, May 26, 2017, June 16, 2017, June 20, 2017, July 3, 2017, July 6, 2017, July 17, 2017, July 27, 2017, August 21, 2017, August 22, 2017, August 30, 2017, September 15, 2017, October 4, 2017, November 7, 2017, December 26, 2017, March 6, 2018 April 2, 2018, May 10, 2018, June 28, 2018, October 5, 2018, October 26, 2018, January 4, 2019, January 25, 2019, and February 4, 2019. The government again requests reciprocal discovery from the defendants.

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The discovery production mailed to you on February 15, 2019 contains the following materials received by the government from third parties:

- Emails and other documents received by the government, and produced by the following individuals whose names have been provided to you in the government's February 15, 2019 email:
 - JB-000001 – JB-000123
 - JH-000003105 – JH-000003138
 - AJ-000000001 – AJ-000000426
 - BM-000001 – BM-000006
 - TW-000000001 – TW-000000148
 - AZ-00000001 – AZ-00000152
- Affidavits for brokerage records produced by brokerage firms or other financial institutions, relating to the holders of Black Elk Energy Offshore Operations, LLC's 13.75 percent senior secured notes due on December 1, 2015 (the "BE Bonds")
 - BLACK ELK ENERGY 000004
 - CBNA000009
 - FIRST-CLEARING-000019
 - JPM-CLEARING-000002
 - MS 00000002
 - MTBANK-000012
 - RBCCM-000002
 - VAN0011
 - WEDBUSH-000003
- Affidavits for various bank records previously produced by the Government: EDNY-PP-BR-000372922 - EDNY-PP-BR-000372942
- A Black Elk Energy Offshore Operations LLC filing with the U.S. Securities and Exchange Commission: BEE_F-00001235
- Records provided by the Platinum Receiver: RECEIVER_00000001 - RECEIVER_00000030
- Business records and other documents obtained by the United States Securities and Exchange Commission ("SEC") and provided to the government since the government's last discovery production: SEC-NY-09271-EPROD-004770851 - SEC-NY-09271-EPROD-004772536. A description of those documents is set forth below:

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Name of Bank	Account Number	Account Name
Sterling	5454	Nordlicht Management III LLC
Sterling	9927	LaFitte Energy LLC
Sterling	5744	Golden Globe Energy Corp.
Sterling	0359	BA Note Acquisition LLC
Sterling	0578 0607	Platinum Partners Liquid Opportunity Fund (USA) L.P.
Sterling	0586 0615	Platinum Partners Liquid Opportunity Fund (International) Ltd.
Sterling	0594	Platinum Partners Liquid Opportunity Fund L.P.
Sterling	0623	MNDR Group LLC
Sterling	3162	Mark Nordlicht Grantor Trust
Sterling	6806	Henley Investment Partners, LP
Sterling	8820	TKN Equity LLC
Sterling	0703	Mark Nordlicht

Very truly yours,

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 Eastern District of New York

By: /s/
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cc: Clerk of the Court (BMC) (by ECF) (w/o enclosures)
 Defense Counsel (by ECF and E-mail) (w/o enclosures)